

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SPIN MASTER LTD., et al.,)
Plaintiff,)
v.) Case No. 24-CV-03532
THE PARTNERSHIPS AND)
UNINCORPORATED)
ASSOCIATIONS IDENTIFIED ON)
SCHEDULE A,)
Defendants.

Defendants' Submission on Briefing Schedule

Defendant stores #4 Cao County Mingrui Handicraft Factory, #5 Changzhou
Mermei Industry Co., Ltd., #8 Chengdu Andrey Trade Co., Ltd., #14 Dongguan
Huan Lin Magnetic Industry Co., Ltd., #20 Guangzhou Huaya Biotechnology Co.,
Ltd., #43 Sichuan Lantu Culture Technology Co., Ltd., #45 Top Ace Development
Limited, #46 Wenzhou Lvyuan Arts and Crafts Co., Ltd. (hereinafter "**Defendant
Stores**") hereby submit the following proposed briefing pursuant to Judge Jenkins'
standing order with respect to Motions and Memoranda of Law:

Defendant Stores filed their motion to dissolve the Preliminary Injunction (“*PI*”) simultaneously with this submission.

From Defendant Stores:

Defendant Stores requested that Plaintiffs propose a briefing schedule. Plaintiff's said they needed 8 months, until April 10, 2025. Defendant Stores, counter proposed 14 days for the response and 7 days for the reply. Plaintiffs

rejected that proposal, claiming that they “need and are entitled to discovery to respond to your motion, which includes many substantive arguments and defenses”.

On the contrary, Defendant Stores’ motion to dissolve claims two things: 1) that the evidence Plaintiffs submitted in support of their motion for an ex parte Temporary Restraining Order and motion for PI was severely deficient and 2) there are serious questions as to the validity of the trademark registrations the motion for a PI relied upon. Neither of those contentions requires discovery from Defendants Stores or third parties. Indeed, the claim that discovery is needed is a concession that the PI should not have been granted and therefore should be dissolved.

Pursuant to the Court’s standing order on motions, Plaintiff was invited to add a portion of this submission to make it a joint submission. The proposed joint submission was forwarded to counsel on Friday August 16, 2024. Although Plaintiff did not respond, the paragraphs above accurately outline the Plaintiff’s position with respect to a briefing schedule.

Date: August 20, 2024.

Respectfully submitted,

Defendant stores #4 Cao County Mingrui Handicraft Factory, #5 Changzhou Mermei Industry Co., Ltd., #8 Chengdu Andrey Trade Co., Ltd., #14 Dongguan Huan Lin Magnetic Industry Co., Ltd., #20 Guangzhou Huaya Biotechnology Co., Ltd., #43 Sichuan Lantu Culture Technology Co., Ltd., #45 Top Ace Development Limited, #46 Wenzhou Lvyuan Arts and Crafts Co., Ltd.

By:/s/ Wesley E Johnson
One of their attorneys

Wesley Johnson
Goodman Tovrov Hardy & Johnson LLC
105 W. Madison, Suite 1500
Chicago, IL 60602
(312) 752-4828
Fax: (312) 264-2535
wjohnson@goodtov.com

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on August 20, 2024, I served a copy of the attached **Defendants' Submission on Briefing Schedule**, on all parties who have appeared via ECF.

By: /s/ WESLEY E JOHNSON